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March 10, 2022

## MEMO ENDORSED

Via ECF

The Honorable Edgardo Ramos United States District Judge Thurgood Marshall U.S. Courthouse 40 Foley Square New York, NY 10007

The application	is	X 	granted
			denied

Edgardo Ramos, U.S.D.J

Dated: 03/11/2022 New York, New York

Re: Deutsche Bank Securities Inc. v. Kingate Global Fund Ltd., et al., No. 19-cv-10823-ER (S.D.N.Y.)

Dear Judge Ramos,

I write on behalf of Defendants Kingate Global Fund, Ltd. and Kingate Euro Fund, Ltd. (the "<u>Funds</u>"), pursuant to Paragraph 3.ii of Your Honor's Individual Practices, for approval to file a redacted version of the Funds' response letter to Plaintiff Deutsche Bank Securities Inc.'s ("<u>DBSI</u>") letter brief of February 18, 2022. ECF Nos. 95-96.

The Funds' response letter describes documents that the Funds designated as Highly Confidential under the Protective Order. This designation represents the Funds' good faith judgment that disclosure of the information would "cause serious and irreparable competitive or other harm that cannot be avoided by less restrictive means." ECF No. 48 ¶ 2(b). The Court previously granted DBSI's motion to file a redacted version of its letter brief of February 18, 2022, which describes the same documents. See ECF No. 97. Because the Protective Order provides that any Protected Information, including information designated as Highly Confidential, used in open court shall lose its confidential status, see ECF No. 48 ¶ 15, the Funds respectfully request that the Court grant this letter motion to seal.

Respectfully submitted,

/s/ Andrew R. Dunlap

Andrew R. Dunlap

Cc: Counsel of Record